

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

JOSEPH FRIEDHEIM, IASMIN	§	
FRIEDHEIM, and JF SOLUTIONS LTD.	§	
<i>Plaintiffs/Intervention Defendants,</i>	§	
	§	
v.	§	Civil Action No. 4:20-cv-335
	§	
THOMAS HOEBER	§	
<i>Defendant,</i>	§	
	§	
HÖEBER MEDIA, LLC	§	
<i>Intervenor Plaintiff/Counter-Defendant</i>	§	

2ND DECLARATION OF BRIAN CASPER IN SUPPORT OF
DEFENDANTS' BRIEF IN SUPPORT OF ATTORNEYS' FEE AWARD

1. My name is Brian Casper. I am over 18 years of age, of sound mind, and capable of making this declaration. The facts stated herein are within my personal knowledge and are true and correct.

2. I have reviewed the billing records and calculated the expense for the following pleadings:

Pleading:	Attorney Hours	Paralegal Hours	Total Cost
Motions to Dismiss and Reply Briefs	43.6	2.3	\$18,118.50
Motion for Summary Judgment and Reply	80	20.1	\$38,090.10
Response to Motion to Amend	22.1	3.3	\$9,091.00
Objection and Response to Motion for leave to file Sur-reply	6.2	.7	\$2,474.00
Total:			\$67,773.60

3. While the attorney hours in the chart above are combined, the total cost was calculated using each biller's individual standard rates.

4. I have also gone through the billing records and calculated the paralegal and attorney's fees expended in the preparation for and taking of the depositions. These fees, when calculated at each biller's individual standard rates equaled \$26,183.00.

5. Finally, I have updated the billing records to reflect the work completed as of March 25, 2022 which includes the time spent drafting the Motion for Attorneys' Fees and the Reply Brief. The new totals are as follows:

Timekeeper	Customary Rate	Hours Worked	Lodestar Amount
Darin Klemchuk	\$ 595.00	45.9	\$ 27,310.50
Brian Casper	\$ 425.00	731.9	\$ 311,057.50
Mandi Phillips	\$ 412.00	68	\$ 28,016.00
Christian Cowart	\$ 325.00	33.4	\$ 10,855.00
Tynan Edwards	\$ 250.00	16.7	\$ 4,175.00
Gail Ashby	\$ 195.00	503.4	\$ 98,136.00
Claudia Alvarado	\$ 205.00	24.3	\$ 4,981.50
Total:			\$ 484,531.50

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration is executed on March 25, 2022.

/s/ Brian Casper
 Brian Casper